

AmTrust Tax Strategy – Fiscal Year 31 December 2018

1. Introduction

This document sets out the strategic tax objectives for the AmTrust International Group (“ALL Group”) and its subsidiaries (“the Group”). In making this strategy publically available, we are fulfilling our responsibilities under Schedule 19 of the Finance Act 2016 for the accounting period ending 31 December 2018.

The tax strategy is prepared and updated by the AmTrust International Head of Tax, reviewed by the AmTrust International Chief Financial Officer (“CFO”) and Senior Accounting Officer (“SAO”), and agreed by the Group’s Executive Committee and Board of Directors (“Board”).

The strategy is reviewed and updated, as necessary, at least on an annual basis, taking into account changes to how we do business or our group structure.

2. Strategy principles

Compliance by the ALL Group with its tax obligations and its relations with tax authorities is governed by the following principles and objectives:

- Compliance with tax rules in the various countries and territories in which the Group operates, paying all taxes due in accordance with the respective legal systems;
- The making of decisions on tax matters based on a reasonable interpretation of applicable legal provisions and in close relationship to the activities of the Group;
- The prevention and reduction of significant tax risks, ensuring that taxes bear an appropriate relationship to the structure and location of activities, human and material resources, and the Group’s business risks;
- Maintaining the strong relationship with tax authorities based on respect for the law, fidelity, reliability, professionalism, cooperation, reciprocity, and good faith, without prejudice to the legitimate disputes that, observing the aforementioned principles and in the defence of the corporate interest; and
- Information is to be provided by the CFO to the Executive Committee and the Board on the main tax implications of the transactions or matters when they are a significant factor in making a decision or approvals are required.

3. Tax strategy and risk appetite

The Group’s tax strategy is compliance-based and focussed on accounting for tax on an accurate and timely basis.

The Group’s appetite for tax risk is low. As such, the Group does not pursue aggressive or high risk planning opportunities, nor does it participate in any tax avoidance schemes rather just standard management of its tax affairs.

The Group’s key risks are compliance (including reporting), legislative changes and transaction risks.

4. Tax authority relationships

The Group is committed to the principle of transparency in its approach to dealing with taxing authorities in the various countries and territories in which the Group operates, and particularly the Group commits to:

- Make fair, accurate and timely disclosure in correspondence and returns, and respond to any queries and information requests in a timely manner;
- Aim to resolve issues with the respective taxing authority(ies) in a timely manner, and where disagreements arise work with the respective taxing authority(ies) to resolve issues by agreement where possible;
- Be open and transparent about decision-making, governance and tax planning;

- Reasonably believe that transactions are structured to give a tax result which is not inconsistent with the economic consequences;
- Interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently; and
- Ensure all interactions with the respective taxing authority(ies) are conducted in an open, collaborative and professional manner.

5. Governance and Resources

Our tax operating model is delivered by a dedicated in-house tax function that liaises with external tax advisors on a regular basis to ensure tax risks are mitigated and managed effectively. The team is supported by accounting processes and procedures with a summary of key tax risks and associated controls that are monitored to ensure tax-compliance.

6. Roles and responsibilities

The AmTrust International CFO has overall responsibility for the execution of the strategy and acts as the SAO. As part of this role, the SAO must submit an annual certificate to HMRC stating that the Group has appropriate tax accounting arrangements. The Group is also compliant with other tax authorities on a similar basis, where relevant.

On a day-to-day basis, preparation of information and returns, payments of tax, technical advice and so forth are dealt with by the tax team. The AmTrust International Head of Tax reports to the SAO.

The ALL Group's main tax advisors are EY although other advisors are engaged on an ad-hoc basis.

7. Risk identification

As part of the SAO review and internal control monitoring processes, the Group has performed an analysis of key tax processes (covering VAT, corporation tax, IPT and employment tax) with the assistance of third party advisors. The Group's risks and related controls are documented in a risk register.

These risks and controls are reviewed regularly and monitored as part of our SAO process. Through governance at the individual subsidiary level, tax risks are subject to review and challenge. Group related risks are monitored through the Group's Executive Committee.

Date: 30 November 2018



Scot Garner
AmTrust International
Group Chief Financial Officer & Senior Accounting Officer